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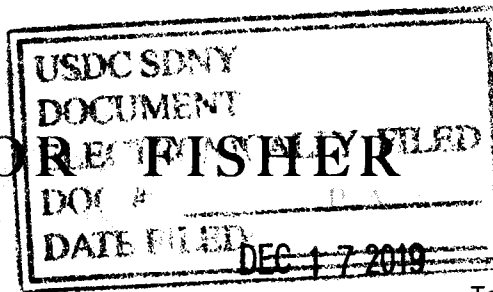
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December 16, 2019

__Via ECF and FedEx__

SO ORDERED:

[signature]

George B. Daniels, U.S.D.J.

Dated: DEC 1 7 2019

The Honorable George B. Daniels
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Parker v. United Industries Corp.*, Case No. 17-cv-05353-GBD, Letter re: Motion for
      Materials to be Filed Under Seal

Dear Judge Daniels:

I represent Plaintiff in the above-captioned matter. Pursuant to Rule I.D of Your Honor's Individual Practices and Paragraph V.1 of the Stipulated Protective Order signed by the Court on October 5, 2017 (ECF No. 15),[1] I respectfully request to file under seal (1) the confidential portions of Exhibits 7, 20, 81, 82, and 86 of the 12/16/19 Declaration of Yitzchak Kopel in support of Plaintiff's reply memorandum of law in support of summary judgment, Plaintiff's reply memorandum of law in support of Plaintiff's motion to preclude the expert testimony of Dr. Denise Martin, Plaintiff's reply memorandum of law in support of Plaintiff's motion to preclude the expert testimony of Dr. William A. Donahue, Jr., and Plaintiff's response to Defendant's unauthorized class certification brief, (2) the portions of Plaintiff's reply memorandum of law in support of Plaintiff's motion for summary judgment that quote or reference documents and/or deposition testimony previously designated by the parties as "confidential" or "highly confidential,", (3) the portions of Plaintiff's reply memorandum of law in support of Plaintiff's motion to preclude the expert testimony of Dr. Denise Martin that quote or reference documents and/or deposition testimony previously designated by the parties as "confidential" or "highly confidential,", (4) the portions of Plaintiff's reply memorandum of law in support of Plaintiff's motion to preclude the expert testimony of Dr. William A. Donahue, Jr. that quote or reference documents and/or deposition testimony previously designated by the parties as "confidential" or "highly confidential,", and (5) the portions of Plaintiff's response to Defendant's unauthorized class certification brief that quote or reference documents and/or deposition testimony previously designated by the parties as "confidential" or "highly confidential."
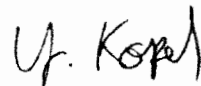
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[1] Specifically, Section V.1 of the Protective Order states, "If a party files or seeks to file with the Court material that another party has designated "Confidential" or "Highly Confidential" under this Order, the filing party shall simultaneously file an *ex parte* application to seal the records that references this Order and that specifically sets forth the terms of this paragraph. In doing so, the filing party shall only seek to file under seal the portion of such material that is "Confidential" or "Highly Confidential."

These documents and deposition testimony contain information that the parties have designated as "Confidential" or "Highly Confidential" under the Stipulated Protective Order. Plaintiff therefore seeks to file the above documents under seal in accordance with his obligations under the Court's Protective Order.

I have attached herewith one full unredacted set of the documents that were filed earlier today with redactions as **Appendices A-E**:

Appendix A:	**Plaintiff's Reply Memorandum of Law in Support of Summary Judgment**
Appendix B:	**Exhibits 7, 20, 81, 82, and 86 to the 12/16/19 Kopel Decl. (Defendant has designated these portions of deposition testimony and documents as "confidential" or "highly confidential")**
Appendix C:	**Plaintiff's Reply Memorandum of Law in Support of his Motion to Preclude the Expert Testimony of Dr. Denise Martin**
Appendix D:	**Plaintiff's Reply Memorandum of Law in Support of his Motion to Preclude the Expert Testimony of Dr. William A. Donahue, Jr.**
Appendix E:	**Plaintiff's Response to Defendant's Unauthorized Class Certification Brief**

Very truly yours,

Y. Kopel

Yitzchak Kopel

CC: All counsel of record (via ECF)